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C O M M E N T S _Background and Recommendations on Anchorage-ODES issues_

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BACKGROUND AND RECOMMENDATIONS FOR ANCHORAGE ODES DATA ADDITION

ISSUES:

1. Recent ODES submissions for effluent have included monthly averages instead of daily values for conventional parameters. This the same or similar information submitted on their DMRs.

    Recommendation Require them to submit daily (or most frequent) measurements. This would be consistent with all other 301(h) dischargers that submit data. In fact, in the past we have disallowed monthly average data submitted by other small Alaska dischargers.

2. What level of QA/QC information is Anchorage "required" to submit to ODES?

    This issue was raised by Anchorage recently when Region X advised them to resume submitting daily values. The plant manager in charge of data collection complained that putting the chemistry QA data into ODES format was very expensive and that he had been directed to cut costs. Therefore, he wants to stop submitting QA information.

    History of Anchorage QA submissions: In general, Anchorage only very recently began submitting any QA data. Therefore, the high cost of submitting QA data may be due to the reprogramming of submissions files maintained by their contractors. If this is the case, once the files are reprogramed the further addition of QA data should be less of a burden. Prior to 1989, no QA information from any 144 filetype was submitted. With their recent effluent and water quality data (since 1990) they have begun submitting some of that information. However, the extent and type of QA information has been very inconsistent both between filetypes and within filetypes. They still have not submitted any QA data for the sediment chemistry or bioaccumulation filetypes.

    As part of the QA review that Tetra Tech performs, we have consistently requested the QA information, preferably as part of the ODES formatted data but at least as part of their data questionaire. They have been fairly good about providing us a copy of their annual report that contains the QA information. However, this requires us to spend additional time synthesizing that information as part of our review. It also does not provide the orignial data in ODES so an independent review of the information is not possible by us or any

other interested party.

Anchorage permit requirements are stated very generally - All data should be submitted in ODES format - and could be interpreted in several ways depending on ones objectives. Therefore, EPA must make a determination on the level of QA information that should be submitted and communicate that with Anchorage.

RECOMMENDATION

Require them to submit the QA data that is associated with each chemical analysis (e.g., method blanks, spikes, surrogates, SRMs) for each filetype where it occurs (i.e., effluent, water quality, sediment chemistry, bioaccumulation).

By requiring that QA data be submitted several things can be accomplished:

1) The raw QA data can be preserved in ODES for use by anyone who wants to review the data.

2) With modernization of STORET and moving toward more automated review process, this will be necessary in the future to perform assessments of the data quality.

3) It will enhance Tetra Tech's review process by not depending on annual reports, but instead using the new electronic summary reports that we are implementing with AMS.

ALTERNATIVES

1) Require that only a portion of the QA data be submitted - i.e., that information that is the most improtant for judging the quality of a data set (e.g., method blanks, spike recovery percentages). There is some precedence here because until recently (~1990) we only had one field for linking QA data to the field data. We now have about 8 different fields for linking this data.

2) Status Quo - do nothing different and continue to accept the data without QA information and continue to evaluate the annual reports. This option is less satisfying in that it is not consistent with the goal of allowing independent evaluation each data set. However, it may be less time consuming for the submitter (although the amount of QA data generated is not huge) and give a better perception of ODES. The general review of the QA information is still provided in the ODES abstract, so a user can still get a sense of the data quality.